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**VIA ECF**

The Honorable Kelley Brisbon Hodge  
7614 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

Re: *Holland v. Rite Aid Corp. et al.*, Case No. 23-cv-02962

Dear Judge Hodge,

We represent Lead Plaintiff Jennifer DaSilva (“Plaintiff”) in the above-captioned action (the “Action”). We write in response to Defendants’ April 9, 2024 letter regarding the status of the bankruptcy proceedings involving Rite Aid, Corp. and to request that the Court order the parties to meet and confer on a briefing schedule for Individual Defendants’ Heyward Donigan, Matthew C. Schroder, James Peters, Jocelyn Konrad, John T. Standley, Darren W. Karst, and Elizabeth Burr (collectively, the “Individual Defendants,”) anticipated motion(s) to dismiss.

On December 14, 2023, the Individual Defendants, who are not parties to the Rite Aid bankruptcy proceedings, filed a motion petitioning this Court to, as a matter of discretion, stay the Action as to the Individual Defendants through **March 8, 2024**. ECF No. 49. The motion was opposed (ECF No. 54), and that date has now passed. The Individual Defendants do not dispute that the parties to the bankruptcy are not seeking to release Plaintiffs’ claims against the Individual Defendants. Consequently, the bankruptcy proceedings have no bearing on this Action. Nor do the Individual Defendants in their April 9 letter request a further stay of this Action, and no such request could pass legal muster. Additional delay is thus unwarranted and will serve only to prejudice Plaintiff and the putative class.

Accordingly, Plaintiff respectfully requests that the Court order the Parties to meet and confer with respect to a schedule for briefing any motion to dismiss in this Action and jointly file a proposed scheduling order by Monday, April 15, 2024.

Very truly yours,

/s/ Shannon L. Hopkins  
Shannon L. Hopkins